


FILED  D.C.

NOV -1 PM 4:00

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDACLERK U.S. DIST. CT.
S.D. OF FLA.-FTL

UNITED STATES OF AMERICA)

CASE NO. 00-6310-Cr-WDF

Magistrate Judge

v.)

MICHEL DELORIS REID)

Defendant.)

**GOVERNMENT'S RESPONSE TO
THE STANDING DISCOVERY ORDER**

The United States hereby files this response to the Standing Discovery Order. This response also complies with Local Rule 88.10 and Federal Rule of Criminal Procedure 16, and is numbered to correspond with Local Rule 88.10.

- A. 1. The government is unaware of any written or recorded statements made by the defendant.
2. That portion of the written record containing the substance of any oral statement made by the defendant before or after arrest in response to interrogation by any person then known to the defendant to be a government agent is attached. See Report.
3. No defendant testified before the Grand Jury.
4. The NCIC record of the defendant, if any exists, will be made available upon receipt by this office.
5. Books, papers, documents, photographs, tangible objects, buildings or places which the government intends to use as evidence at trial to prove its case in chief, or were obtained or belonging to the defendant may be inspected at a mutually convenient time at the Office of the United States Attorney, 500 E. Broward Blvd., 7th Flr., Ft. Lauderdale, Fl. 33394. Please call the undersigned to set up a

12

date and time that is convenient to both parties. The undersigned will tentatively set the date for 11/16/00 at 10:00 a.m. Please call the undersigned with 48 hours notice if you intend to review the evidence at this date and time.

The attachments to this discovery response are not necessarily copies of all the books, papers, documents, etc., that the government may intend to introduce at trial. See Attachment.

6. A laboratory analysis of the substance seized in connection with this case will be made available to you upon receipt by this office.
- B. DEMAND FOR RECIPROCAL DISCOVERY: The United States requests the disclosure and production of materials enumerated as items 1, 2 and 3 of Section B of the Standing Discovery Order. This request is also made pursuant to Rule 16(b) of the Federal Rules of Criminal Procedure.
- C. The government will disclose any information or material which may be favorable on the issues of guilt or punishment within the scope of Brady v. Maryland, 373 U.S. 83 (1963), and United States v. Agurs, 427 U.S. 97 (1976).
- D. The government will disclose any payments, promises of immunity, leniency, preferential treatment, or other inducements made to prospective government witnesses, within the scope of Giglio v. United States, 405 U.S. 150 (1972), or Napue v. Illinois, 360 U.S. 264 (1959).
- E. The government will disclose any prior convictions of any alleged co-conspirator, accomplice or informant who will testify for the government at trial.
- F. No defendant was identified in a lineup, show up, photo spread or similar identification proceedings.
- G. The government has advised its agents and officers involved in this case to preserve all rough notes.
- H. The government will timely advise the defendant of its intent, if any, to introduce during its case in chief proof of evidence pursuant to F.R.E. 404(b). You are hereby on notice that all evidence made

available to you for inspection, as well as all statements disclosed herein or in any future discovery letter, may be offered in the trial of this cause, under F.R.E. 404(b) or otherwise (including the inextricably-intertwined doctrine).

- I. The defendant is not an aggrieved person, as defined in Title 18, United States Code, Section 2510(11), of any electronic surveillance.
- J. The government has ordered transcribed the Grand Jury testimony of all witnesses who will testify for the government at the trial of this cause.
- K. The government will, upon defense request, deliver to any laboratory presently registered with the Attorney General in compliance with 21 U.S.C. § 822 and § 823 and 21 C.F.R. 1301.13, a sufficient representative sample of any alleged contraband which is the subject of this indictment to allow independent chemical analysis of such sample.

If there is no response within ten (10) days from the date of the Certificate of Service attached hereto, the bulk of the contraband/narcotics will be destroyed. As usual, random samples will be set aside to be used as evidence at trial.
- L. The government does not know of any automobile, vessel, or aircraft allegedly used in the commission of this offense that is in the government's possession.
- M. The government is not aware of any latent fingerprints or palm prints which have been identified by a government expert as those of the defendant, at this time.
- N. To date, the government has not received a request for disclosure of the subject-matter of expert testimony that the government reasonably expects to offer at trial.
- O. The government will make every possible effort in good faith to stipulate to all facts or points of law the truth and existence of which is not

contested and the early resolution of which will expedite trial. These stipulations will be discussed at the discovery conference.

P. N/A.

The government is aware of its continuing duty to disclose such newly discovered additional information required by the Standing Discovery Order, Rule 16(c) of the Federal Rules of Criminal Procedure, Brady, Giglio, Napue, and the obligation to assure a fair trial.

In addition to the request made above by the government pursuant to both Section B of the Standing Discovery Order and Rule 16(b) of the Federal Rules of Criminal Procedure, in accordance with Rule 12.1 of the Federal Rules of Criminal Procedure, the government hereby demands Notice of Alibi defense; the approximate time, date, and place of the offense was:

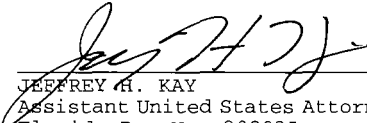
Time:
Date: 10-14-2000
Place: FTL International Airport/Customs
Enclosure

The attachments to this response are numbered pages 1 - 4. Please contact the undersigned Assistant United States Attorney if any pages are missing.

Respectfully submitted,

GUY A. LEWIS
UNITED STATES ATTORNEY

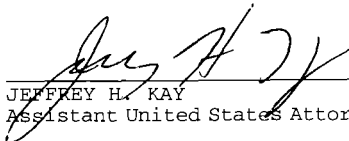
By:


JEFFREY H. KAY
Assistant United States Attorney
Florida Bar No. 208035
500 E. Broward Blvd., 7th flr.
Ft. Lauderdale, FL 33394
Tel: (954) 356-7255
Fax: (954) 356-7336

cc: Special Agent
Agency

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was delivered by United States mail this 1st day of November, 2000 to: Patrick Hunt, Esquire, Assistant Federal Public Defender, 101 N.E. 3rd Avenue, Ft. Lauderdale, Florida 33301.



JEFFREY H. KAY
Assistant United States Attorney

A T T A C H M E N T

1. U.S. Customs Declaration - Michel Reid
2. Air Jamaica boarding pass
3. International Travel Services Ltd No. 41083 dated 10-12-00
4. Jamaica passport #2508955
5. U.S. Customs report of investigation

APRIST-WS USE ONLY

WELCOME

CUSTOMS USE ONLY

TO THE
UNITED STATESDEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICEFORM APPROVED
ONE NO. 1515-3041

CUSTOMS DECLARATION

15 CFR 122.27, 148.12, 148.13, 148.110, 148.113

Each arriving traveler or responsible family member must provide the following information (only ONE written declaration per family is required).

1. Family Name

Reid

2. First (Given) Name

Michel

3. Middle Initial(s) 4. Birth Date (day/month/year)

D 12 11 78

5. Airline/Flight No. or Vessel Name or Vehicle License No.

Air J

6. Number of Family
Members Traveling
With You

7. (a) Country of Citizenship

Jamaica

7. (b) Country of Residence

Jamaica

8. (a) U.S. Address (Street Number/Hotel/Mailing Address in U.S.)

19000 North West

8. (b) U.S. Address (City)

18th South

8. (c) U.S. Address (State)

Ola Loka

9. Countries visited on this trip prior to U.S. arrival

a

N/A

b

A

c

d

10. The purpose of my (our) trip is or was.
(Check one or both boxes, if applicable)☐ Business☒ Personal

11. I am (We are) bringing fruits, plants, meats, food, soil, birds, snails, other live animals, wildlife products, farm products, or, have been on a farm or ranch outside the U.S.

☒ Yes☐ No

12. I am (We are) carrying currency or monetary instruments over \$10,000 U.S. or foreign equivalent.

☐ Yes☒ No

13. I have (We have) commercial merchandise, U.S. or foreign. (Check one box only)

☐ Yes☒ No

14. The total value of all goods, including commercial merchandise, I/we purchased or acquired abroad and am/are bringing to the U.S. is.

\$ (U.S. Dollars)

(See the instructions on the back of this form under "MERCHANDISE" and use the space provided there to list all the items you must declare. If you have nothing to declare, write "0" in the space provided above.)

SIGN BELOW AFTER YOU READ NOTICE ON REVERSE

I have read the notice on the reverse and have made a truthful declaration.

X M. Reid

Signature

Date (day/month/year)

U.S. Customs use only -- Do not write below this line -- U.S. Customs use only

INSPECTOR'S BADGE NUMBER

STAMP AREA

TIME COMPLETED

Customs Form 6059B (012799)

MBJ 9.10 — 9.45 KIN
 KIN 10.45 — 1.25 FLL
 FLL 8.00 — 8.40 MBJ

AIRLINE		SPECIAL INFORMATION	
AIR JAMAICA		KIN-FLL ONLY	
FLIGHT	DATE TO	CLASS	SERVICE INFORMATION
JM0087	14OCT FLL	Y	
NAME	SEAT NR	1ST CLUB	ECON
REID M	60		60
JM0087 14OCT FLL			

INTERNATIONAL TRAVEL SERVICES LIMITED

1600000 - 160000
17500 - 500148 MARKET STREET,
SAB SHAPE SQUARE,
MONTEGO BAY, ST. JAMES
TEL: 952-2486, 952-1166, 952-2578

442

RECEIPT MB N° 41083

DATE 12/19/00

Received from

Michelle Leal

The sum of

Sixteen Thousand and four hundred.

Ticket No(s)

fifty eight Dollars 2013352527714

Cents for

PARTICULARS OF TICKET

	\$	¢
FARE	13214	00
STAMP DUTY	600	00
TRAVEL TAX	268	00
OTHER COLLECTIONS	2376	00
TOTAL	16458	00

FORM OF PAYMENT

ASH

AUTHORIZED SIGNATURE

M. Leal

WITH THANKS

This Passport contains 48 pages
Ce Passeport contient 48 pages
Este Pasaporte contiene 48 paginas

PASSPORT PASSEPORT PASAPORTE JAMAICA

2508955

No. of passport
No. du passeport
No. del pasaporte

Name of bearer
Nom du titulaire
Nombre del titular

Miss Michel REID
Dulcie

Accompanied by his wife
(Maiden Name)
Accompagné de sa femme
(Née)
Acompañado de su esposa
(Apellidos de soltera)

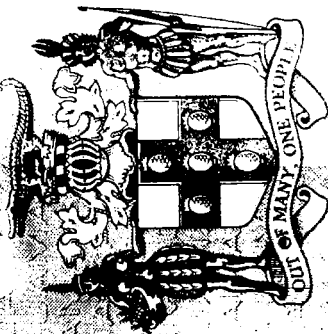
children
enfants
niños

National status

Nationalité

Nacionalidad

Citizen of Jamaica and Commonwealth Citizen



*The Minister of Foreign Affairs
requests and requires in the
name of the Government of Jamaica
all those whom it may concern
to allow the bearer to pass freely
without let or hindrance, and to
afford the bearer such assistance
and protection as may be necessary.*

2 DESCRIPTION - SIGNALEMENT - SEÑAS PERSONALES

Bearer - Titulaire - Titular	Wife - Femme - Esposa
Profession Profession	<u>Secretary</u>
Place and date of birth Lieu et date de naissance	<u>Jamaica</u> <u>12th November 1978</u>
Country of Residence Pays de Residence	<u>Jamaica</u>
Height Taille	<u>5' 01"</u> in. / <u>127</u> cm.
Complexion Couleur des yeux	<u>Dark</u>
Colour of hair Couleur des cheveux	<u>Brown</u>
Special particularities Signes particuliers	<u>Black</u>

CHILDREN - ENFANTS - NIÑOS
Name - Nom - Nombre Date of Birth - Date de naissance Sex - Sexe - Sexo
Fecha de nacimiento

Grand Signature of Bearer Signature du Titulaire Firma del Titular	<u>Michael Bana</u>
Grand Signature of Wife Signature de la Femme Firma de la Esposa	

Bearer
Titulaire
Titular



Wife
Femme
Esposa

PHOTO

U.S. IMMIGRATION
068 PEV #115

OCT 14 2000

ADMITTED
UNTIL

UNITED STATES
OF AMERICA

Issuing Post Name
MILITARY

KINGS
SUNAM
REID

Given Name
MICHEL DELORES

Passport Number
051005

2004
EPMAS

Annotation

Control Number
20002634740001

Use Type /Class

R 81/82
Nationalist

478 JAM

Birth Date
12NOV1978

18SEP2010

ISSUE DATE
20SEP2000

39381160

VNJAMREID<<MICHEL<DELORIS<<<<<<<<<<<<<<<<<
2508955<<2JAM7811126F00D9209B310E4299CB54212

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DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

11. TECH ACCESS CODE 3

12. PAGE 1

13. CASE NUMBER FL13CR01PL000

REPORT OF INVESTIGATION

14. TITLE: MICHELE REID / COCAINE IN SAUCE BOTTLES

15. CASE STATUS: INIT RPT

16. REPORT DATE 17. DATE ASSIGNED 18. CLASS 19. PROGRAM CODE 110. REPORT NO.
101700 101600 1 1 211 001

11. RELATED CASE NUMBERS:

12. COLLATERAL REQ:

13. TYPE OF REPORT:
INVESTIGATIVE FINDINGS / OTHER

TOPIC: CASE OPENING

14. SYNOPSIS:

This report relates to an investigation of Michel Deloris REID, who, on October 14, 2000, attempted to smuggle approximately 1.41KG of cocaine into the United States. REID was travelling from Jamaica and was carrying 14 assorted bottles of soy sauce later found to contain cocaine.

This report also serves to open this investigation.

115. DISTRIBUTION:
TRACEL SACMI

116. SIGNATURE:

ARN

CART

SPECIAL AGENT

117. APPROVED:

MACDONALD

JAMES

DI GRP SUPERVISOR

118. ORIGIN OFFICE: FL
FT LAUDERDALE - RAC

119. TELEPHONE: 954 921 3509

120. TYPIST: ARN

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DEPARTMENT OF THE TREASURY
UNITED STATES CUSTOMS SERVICE

11. PAGE 2

REPORT OF INVESTIGATION
CONTINUATION

12. CASE NUMBER FL1000010007

13. REPORT NUMBER: 001

On October 14, 2000, U.S. Customs Inspectors in Fort Lauderdale, Florida, conducted an inbound inspection of passengers arriving into the United States at Fort Lauderdale/Hollywood Inter'l Airport from Kingston, Jamaica, onboard Air Jamaica Flight #87. Michel Deloris REID arrived on this flight and was referred for a secondary Customs inspection. During routine questioning, REID stated that she was a Jamaican citizen and had only visited the United States on two previous occasions. This information was verified through TECS. REID stated that she was coming to Florida for a family reunion in Opalocka. When asked the name of the family, REID hesitated and then stated "Murdock". REID did not, however, know the address of the Murdock family. REID's baggage, which consisted of one checked bag and one carry-on bag, was inspected and found to contain over fifteen (15) bottles of cooking sauces, in two different sizes. REID stated that the sauces were for the reunion. Customs Inspector Hays believed that the bottles seemed overly heavy, based on their sizes and liquid contents. A few of the bottles were X-rayed, but appeared normal. One of the bottles was opened and probed with a bent clothes hanger. A hard substance was discovered several inches from the top of the bottle, making it impossible for the probe to reach the bottom of the bottle.

Two of the bottles were then broken open, one of each size. The contents of both bottles revealed egg shaped balls of a white powdery substance rolled up in black plastic tape. The powder inside field tested positively for cocaine. All of the other bottles were then opened and probed. Fourteen (14) bottles contained other "eggs". It was also noted that all of the bottles containing the "eggs" had been cut at the bottom of the bottles, around the circumference of the bottles. The few bottles that contained only sauce had no visible cut lines.

Based on the sizes and weights of the two "eggs" in the broken bottles, it was estimated that the weight of all of the cocaine hidden in the sauce bottles was 1.418 kilograms.

REID was advised of her rights per Miranda and refused to speak to Agents.

INS officials interviewed REID and an INS hold was placed on her.

Also on that day, REID was transported to the Federal Detention Center in Miami, Florida. The cocaine taken from her baggage was transported to the Seized Property Custodian.

On October 16, 2000, REID appeared in front of Federal Judge Magistrate S now for an initial hearing.

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